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 Attorneys For The Plaintiffs

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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BEATRIZ VEERMAN AND KHADIJETOU : **1:08-CV-05042-LAB**  
 ("KADIA") BA, :

Plaintiffs, :

- against - :

**NOTICE OF PLAINTIFFS' MOTION  
 FOR ATTORNEYS' FEES AND COSTS  
 AND PRE-JUDGMENT INTEREST**

DEEP BLUE GROUP LLC, OPIA, :  
 FREDERICK LESORT, AND ANTOINE :  
 BLECH (a/k/a Antoine Bleck), :

Defendants. :

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PLEASE TAKE NOTICE that, upon the Certification of Kenneth A. Goldberg, dated July 23, 2010 and the exhibits thereto, the Declaration of Jonathan S. Abady, Esq., dated July 20, 2010, the Declaration of Raymond Nardo, Esq., dated July 20, 2010, and the Memorandum of Law In Support of Plaintiffs' Motion, the Plaintiffs, by their counsel, will move this Court before the Honorable Larry Alan Burns, U.S.D.J., in the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York, at such time as counsel may be heard, for an Order pursuant to the Federal Rules of Civil Procedure, N.Y.C. Admin. Code § 8-502, New York Labor Law § 215, and 42 U.S.C. § 2000e-5, granting Plaintiffs' Motion and awarding Plaintiffs

attorneys' fees, costs and pre-judgment interest, and for such other and further relief as may be just and proper.

Dated: July 23, 2010  
New York, New York

GOLDBERG & FLIEGEL LLP  
/s/ Kenneth A. Goldberg  
By: \_\_\_\_\_  
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